

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALAN STEVENS, On Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

CITIGROUP, INC., CITIBANK, N.A.,
CHARLES PRINCE, C. MICHAEL
ARMSTRONG, ALAIN J.P. BELDA, GEORGE
DAVID, KENNETH T. DERR, JOHN M.
DEUTCH, PETER JOHNSON, ROBERTO
HERNANDEZ RAMIREZ, ANDREW N.
LIVERIS, ANNE MULCAHY, RICHARD D.
PARSONS, JUDITH RODIN, ROBERT E.
RUBIN, ROBERT L. RYAN, FRANKLIN A.
THOMAS, THE PLANS ADMINISTRATION
COMMITTEE OF CITIGROUP, INC., THE
INVESTMENT COMMITTEE and JOHN DOES
1-30,

Defendants.

Civil Action No.: 07 Civ. 11156 (UA)

(Caption Continued)

**RESPONSE OF PLAINTIFF ALAN STEVENS TO THE *GRAY AND TADROS*
PLAINTIFFS' MOTION FOR (1) CONSOLIDATION, (2) APPOINTMENT OF LEAD
PLAINTIFFS AND LEADERSHIP STRUCTURE, AND (3) ENTRY OF [PROPOSED]
PRETRIAL ORDER NO. 1**

STEPHEN GRAY, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC. CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-10,

Defendants.

MEREDITH TRANBERG, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

Civil Action No.: 07 Civ. 9790 (SHS)
(DCF)

Civil Action No.: 07 Civ. 10294 (DC)

Civil Action No.: 07 Civ. 10341 (UA)

(Caption Continued)

ANTON K. RAPPOLD, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN AND JANE DOES 1-10,

Defendants.

SAMIER TADROS, On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, FRANKLIN A. THOMAS, JOHN DOES 1-20 (BEING CURRENT AND FORMER MEMBERS OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING CURRENT AND FORMER MEMBERS OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),

Defendants.

Civil Action No.: 07 Civ. 10396 (UA)

Civil Action No.: 07 Civ. 10442 (UA)

(Caption Continued)

STEPHAN FIORINO, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

Civil Action No.: 07 Civ. 10458 (UA)

JAMES BOLLA, individually and on behalf of all others similarly situated,

Plaintiff,

vs.

CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

Civil Action No.: 07 Civ. 10461 (UA)

MARK GEROULO, individually, on behalf of the CITIGROUP 401(k) Plan, the CITIBUILDER 401(k) PLAN FOR PUERTO RICO, and all others similarly situated,

Plaintiff,

vs.

CITIGROUP, INC., CITIBANK, N.A. THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, JOHN DOES 1-10, THE CITIGROUP 401(k) PLAN INVESTMENT COMMITTEE and JOHN DOES 10-20, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ, ANN DIBBLE JORDAN, ANDREW N. LIVERIS, DUDLEY C. MECUM, ANNE M. MULCAHY, RICHARD D. PARSONS, ANDRALL E. PEARSON, CHARLES PRINCE, JUDITH RODIN, ROBERT E. RUBIN, FRANKLN A. THOMAS, SANFORD I. WEILL,

Defendants.

Civil Action No.: 07 Civ. 10472 (UA)

(Caption Continued)

STEVEN GOLDSTEIN, On Behalf Of Himself
and a Class of Persons Similarly Situated,

Plaintiff,

vs.

CITIGROUP, INC., THE PLANS
ADMINISTRATION COMMITTEE OF
CITIGROUP, INC., MCIHAEL E. SCHLEIN,
CHARLES PRINCE, C. MICHAEL
ARMSTRONG; ALAIN J.P. BELDA; GEORGE
DAVID; KENNETH T. DERR; JOHN M.
DEUTCH; ROBERTO HERNANDEZ
RAMIREZ; ANDREW N. LIVERIS; ANNE
MULCAHY; RICHARD D. PARSONS; JUDITH
RODIN; ROBERT E. RUBIN; ROBERT L.
RYAN; AND FRANKLIN A. THOMAS, and
JOHN DOES 1-30,

Defendants.

CHRIS SOUTHARD, ON BEHALF OF ALL
OTHERS SIMILARLY SITUATED,

Plaintiff,

vs.

CITIGROUP INC., CHARLES O. PRINCE, C.
MICHAEL ARMSTRONG, ALAIN J.P.
BELDA, GEORGE DAVID, KENNETH T.
DERR, JOHN M. DEUTCH, ROBERTO
HERNANDEZ RAMIREZ, ANN DIBBLE
JORDAN, KLAUS KLEINFELD, ANDREW N.
LIVERIS, ANNE MULCAHY, RICHARD D.
PARSONS, JUDITH RODIN, ROBERT E.
RUBIN, ROBERT E. RUBIN, FRANKLIN A.
THOMAS, JOHN DOES 1-20 (BEING
CURRENT AND FORMER MEMBERS OF
THE PLANS ADMINISTRATIVE
COMMITTEE OF CITIGROUP INC.) and JOHN
DOES 21-40 (BEING CURRENT AND
FORMER MEMBERS OF THE IVNESTMENT
COMMITTEE OF THE CITIGROUP INC.
401(K) PLAN),

Defendants.

Civil Action No.: 07 Civ. 11158 (UA)

Civil Action No.: 07 Civ. 11164 (UA)

: (Caption Continued)

WILLIAM and PATRICIA WOODWARD,
Individually and On Behalf of All Others
Similarly Situated,

Civil Action No.: 07 Civ. 11207 (UA)

Plaintiffs,

vs.

CITIGROUP INC., CHARLES PRINCE,
ROBERT E. RUBIN, C. MICHAEL
ARMSTRONG, ALAIN J.P. BELDA, GEORGE
DAVID, KENNETH T. DERR, JOHN M.
DEUTCH, ROBERTO HERNANDEZ
RAMIREZ, ANDREW N. LIVERIS, ANN
MULCAHY, RICHARD D. PARSONS, JUDITH
RODIN, ROBERT L. RYAN, FRANKLIN A
THOMAS, ANN DIBBLE JORDAN, KLAUS
KLEINFELD AND DUDLEY C. MECUM, and
JOHN AND JANE DOES 1-20,

Defendants.

Milberg Weiss LLP, counsel for plaintiff Alan Stevens in the above-captioned action, *Stevens v. Citigroup Inc., et al.*, (Civil Action No.: 07 Civ. 11156) hereby submits this response to the motion of the *Gray and Tadros* Plaintiffs for (1) Consolidation, (2) Appointment of Lead Plaintiffs and Leadership Structure, and (3) Entry of [Proposed] Pretrial Order No. 1 pending before the Court.

Plaintiff Stevens supports consolidation, the appointment of Plaintiffs Stephen Gray, Samier Tadros, and James Bolla as lead plaintiffs, the appointment of Harwood Feffer LLP and Wolf Popper LLP as co-lead counsel to prosecute the consolidated ERISA action, and the entry of [Proposed] Pretrial Order No. 1.

Dated: December 21, 2007

Respectfully submitted:

MILBERG WEISS LLP

/s/ Lori G. Feldman
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Counsel for Plaintiff Alan Stevens

CERTIFICATE OF SERVICE

I, Arvind Khurana, an associate with the law firm Milberg Weiss LLP, hereby certify that I caused a true and correct copy of the following documents to be served with the Clerk of the Court using the CM/ECF system, which will send notifications of filing to the CM/ECF participants listed on the attached Service List, and caused all counsel listed on the Service List to be served by regular U.S. Mail on this 21st day of December 2007:

RESPONSE OF PLAINTIFF ALAN STEVENS TO THE GRAY AND TADROS PLAINTIFFS' MOTION FOR (1) CONSOLIDATION, (2) APPOINTMENT OF LEAD PLAINTIFFS AND LEADERSHIP STRUCTURE, AND (3) ENTRY OF [PROPOSED] PRETRIAL ORDER NO. 1.

/s/ Arvind Khurana

Arvind Khurana

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